

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : INFORMATION

- v. - : 20 Cr. _____

VITALI NILOV, :
a/k/a "Vitaly Nilov," :

Defendant. :

- - - - - x

20 CRIM 193

COUNT ONE

(Conspiracy to Unlawfully Export Rifle-Making Equipment)


The United States Attorney charges:

1. In or about 2019, VITALI NILOV, a/k/a "Vitaly Nilov," the defendant, and others known and unknown, willfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate, and to cause a violation of, licenses, orders, regulations, and prohibitions issued under the Export Control Reform Act.

2. It was a part and an object of the conspiracy that VILTALY NILOV, a/k/a "Vitali Nilov," the defendant, and others known and unknown, would and did agree to export and to cause to be exported from the United States items controlled under Subchapter I of the Export Control Reform Act, to wit, tools for gun rifling machines, to the Russian Federation, without having first obtained a license for such export from the

U.S. Department of Commerce, in violation of Title 50, United States Code, Section 4819(a)(2)(A), (B), (C), (D), (E), (F), and (G), and Title 15, Code of Federal Regulations, Section 736.2(b)(1).

(Title 50, United States Code, Section 4819(a)(1), 4819(a)(2)(A), (B), (C), (D), (E), (F), & (G), and 4819(b), and Title 15, Code of Federal Regulations, Section 736.2(b)(1).)


GEOFFREY S. BERMAN *SGC*
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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50 U.S.C. §§ 4819(a)(1),
4819(a)(2)(A), (B), (C), (D), (E), (F), & (G),
& 4819(b); 15 C.F.R. § 736.2(b)(1)

GEOFFREY S. BERMAN
United States Attorney

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